

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

LOUIS McBRIDE,
Plaintiff,

CIVIL ACTION
NO: 05-11664-GAO

vs.

WOODS HOLE, MARTHA'S VINEYARD &
NANTUCKET STEAMSHIP AUTHORITY and
LAFLEUR CRANE SERVICE, INC.,
Defendants.

JOINT SCHEDULING STATEMENT

Now come the parties, in the above-entitled
action, by and through their undersigned attorneys, and
respectfully submits their proposed Scheduling
Statement as follows:

I. DISCOVERY PLAN

- A. All factual depositions to be completed by
April 28, 2006.
- B. Plaintiff's designation of experts and
disclosure of expert information and reports
pursuant to the Federal Rules of Civil Procedure
served on or before May 31, 2006.
- C. Defendant's designation of experts and
disclosure of expert information and reports
pursuant to the Federal Rules of Civil Procedure
served on or before June 30, 2006.
- D. All expert depositions to be completed by
July 31, 2006.
- E. Final Pretrial Conference to be scheduled after
September 29, 2006.

II. MOTION SCHEDULE

In addition to the above, the parties propose the following motion schedule.

- A. Motions to amend the pleadings, to add parties or to set forth additional claims to be filed on or before January 31, 2006.
- B. Dispositive Motions to be filed by August 31, 2006 with Oppositions filed within twenty-one (21) days as set forth in the Local Rules of this Court.

III. CERTIFICATION

The parties will file their Rule 16.1 Certifications separately.

IV. TRIAL BY MAGISTRATE JUDGE

The parties do not consent to trial by a Magistrate Judge at this time.

V. SETTLEMENT

The plaintiff will tender a settlement demand before the scheduled conference.

WHEREFORE, the parties pray that this Honorable Court adopt the scheduled proposed herein.

Respectfully submitted,

FOR THE PLAINTIFF

**FOR WOODS HOLE, MARTHA'S
VINEYARD & NANTUCKET
STEAMSHIP AUTHORITY**

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Dated: November 9, 2005